

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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**THE NATIONAL FOOTBALL LEAGUE  
PLAYERS ASSOCIATION,**

**Plaintiff,**

**-against-**

**THE NATIONAL FOOTBALL LEAGUE  
MANAGEMENT COUNCIL,**

**Defendant.**

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ECF Case

Civil Action No. 13-CV-2829  
(PAC)

**STIPULATION OF DISMISSAL**

IT IS HEREBY STIPULATED AND AGREED by the parties, through their respective counsel, as follows:

- (1) The parties acknowledge that they are bound by the 2011 National Football League Collective Bargaining Agreement (“CBA”), including Article 41 (“Workers’ Compensation”), Article 43 (“Non-Injury Grievance”), and Paragraph 10 of Appendix A (“NFL Player Contract”);
- (2) Pursuant to Article 41, Section 4 of the 2011 CBA, the parties agree that during the term of the CBA, “No Club shall be entitled to claim or receive any dollar-for-dollar credit or offset, other than as provided for in Article 3 of [the 2011 CBA], for salary, benefits, or other compensation paid or payable to a player against any award or settlement of workers’ compensation benefits, either pursuant to Paragraph 10 of the NFL Player Contract or any provision of state law;”
- (3) The parties further agree that any dispute involving this Stipulation and/or the interpretation of, application of, or compliance with, any provision of the CBA, including the above-referenced provisions, must be resolved exclusively in

accordance with the mandatory grievance and arbitration procedures set forth in the CBA; provided, however, that nothing in this Stipulation will preclude either party from seeking confirmation or vacatur of any final and binding arbitration award issued pursuant to the terms of the CBA;

- (4) Nothing in this Stipulation is intended to expand or limit either party's rights or positions with respect to offsets as set forth in the CBA;
- (5) Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, the above-captioned action is dismissed in its entirety without prejudice, and each party shall bear its own costs, expenses, and attorneys' fees.

Dated: September 25, 2013  
New York, New York

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